

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JAMES A. BIGELOW,

Plaintiff,

vs.

NORTHWEST TRUSTEE SERVICES,
INC.; GREEN TREE SERVICING, LLC;
MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, Inc.;
WRIGHT, FINLAY & ZAK, LLP; TICOR
TITLE COMPANY; NATIONWIDE TITLE
CLEARING; FIRST AMERICAN TITLE
INSURANCE COMPANY; RENEE
PARKER; and DOE DEFENDANTS 1 – 20,

Defendants.

Case No.: 3:14-cv-05798-BHS

**MOTION FOR ENTRY OF
PROTECTIVE ORDER**

NOTE ON MOTION CALENDAR:
MARCH 27, 2015

NOW COMES the Plaintiff, James A. Bigelow, in accordance with the provisions of Fed.
R. Civ. Proc. 26(c), motions this Court for the entry of a Protective Order and states as
follows:

1. In an effort to facilitate the exchange of confidential documents through formal discovery,
the Plaintiff has proposed a Confidentiality Agreement to Defendants. Plaintiff submitted

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James A. Bigelow
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Huntington Beach California 92648
360-790-2568

1 to all Defendants his proposed joint discovery report (Dkt 37). In the Plaintiff's proposed
2 discovery report he proposed entering into a Confidentiality Agreement (see Dkt 27 ¶
3 4(D)) but was met with resistance during the 26(f) conference.

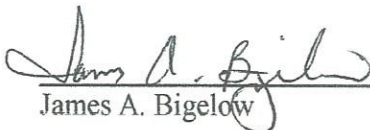
4 2. On or about January 17, 2015, Plaintiff Once again addressed the issue of a confidentiality
5 agreement with the Defendants through email but was met with aggressive resistance (see
6 attachment 1). Attached to this was the Plaintiff's proposed Confidentiality Agreement
7 (see attachment 2).

8 3. On or about February 11, 2015, Plaintiff once again attempted to gain the cooperation of
9 Defendants to enter into a confidentiality agreement through email but received no
10 response (see attachment 3).

11 4. Plaintiff has reasons to believe that without a confidentiality agreement or order,
12 discovery will not be a smooth process and may require actions of the court, ultimately
13 requiring the Plaintiff to motion this Court for additional time to conduct discovery.

14 WHEREFORE, the Plaintiff moves this Court to sign a Protective Order in order to
15 simplify the discovery process.

16 Dated this 13th Day of March, 2015

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20 James A. Bigelow

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22 **CERTIFICATE OF SERVICE**

23 I CERTIFY UNDER PENALTY OF PERJURY under the laws of the State of
24 Washington that the foregoing is true and correct and that a copy of the foregoing has been
25 electronically provided to Renee M. Parker, Esq., and Joseph H. Marshall, Esq.

Executed this 13th day of March, 2015

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James A. Bigelow

4 VERIFICATION

5 STATE OF CALIFORNIA

6 COUNTY OF ORANGE

7 BEFORE ME personally appeared James A. Bigelow who, being by me first duly
8 sworn and identified in accordance with California law, deposes and says:

- 9 1. My name is James A. Bigelow, Plaintiff herein.
10 2. I have read and understood the attached foregoing herein, and each fact alleged therein is
11 true and correct of my own personal knowledge.

12 FURTHER THE AFFIANT SAYETH NAUGHT.

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James A. Bigelow, Affiant

SWORN TO and subscribed before me this 13th day of March, 2015.

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Notary Public



My commission expires: 5/12/2018

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